

## REMARKS

In the Official Action mailed on **March 9, 2005** the Examiner reviewed claims 1, 3-16, 18-31, and 33-61. Claims 1, 3-16, 18-31, and 33-36 were rejected under 35 U.S.C. §103 (a) as being unpatentable over Rundensteiner et al, (*Maintaining Data Warehouse over Changing Information Sources*, Communications of the ACM, June 2000, hereinafter “Rundensteiner”) in view of Henninger, (USPN 5,499,371, hereinafter “Henninger”).

### Rejections under 35 U.S.C. §102(b)

Independent claims 1, 16, 31, 47, and 56-61 were rejected as being unpatentable over Rundensteiner in view of Henninger.

Applicant respectfully points out that Rudensteiner teaches away from the present invention.

The invention of Rudensteiner is directed towards mapping data in a markup language document (e.g., XML document) into a **relational model**. Specifically, a “*data warehouse store typically utilizes relational database technology*” (see Rudensteiner, page 58, right-hand column, lines 21-23). Furthermore, a wrapper “*is in charge of the translation between the native model of the source to the common model of the data warehousing system*” (see Rudensteiner, page 58, right-hand column, lines 26-28). Note that the “common model” of the data warehousing system is a relational model.

In contrast, the present invention is specifically directed towards mapping data in a markup language document directly into an **object model** (see page 2, lines 10-11).

Applicant respectfully points out that relational models and object models are fundamentally different. For example, see Chapter 13, entitled “Object-Oriented Model” in *Database System Concepts*, Korth and Silberschatz, 2<sup>nd</sup> Edition. Specifically, the invention of Rudensteiner does not support

inheritance or relationships in object models because the invention of Rudensteiner is based on a relational model. In fact, the instant application specifically states that previous approaches “*do not provide application object models or support for inheritances or relationships in the object model*” (see page 1, lines 31-32). In contrast, the present invention is specifically directed towards supporting inheritance or relationships in object models (see page 7, lines 26-27, page 8, lines 15-16). Embodiment of the present invention can do this because they map data in markup language documents directly into the object model.

Note that supporting inheritance or relationships in objects models is critically important for supporting object-oriented applications. Furthermore, mapping data in markup language documents directly into object models to support inheritance or relationships is not obvious. Specifically, the embodiments of the present invention achieve this using mapping meta-data described on pages 7 and 8. Additionally, the mapping operation directly maps data into object models using the complex steps described in FIG. 7, 8, 10, and 11.

Furthermore, note that there is nothing within Rudensteiner or Henninger, either separately or in concert, which suggests a method or apparatus for mapping data in a markup language document into an object model which supports inheritance or relationships in the object model.

Accordingly, Applicant has amended independent claims 1, 16, 31, 47, and 56-61 to clarify that mapping the data in the markup language document directly into the object model using the mapping meta-data enables the method/module/executor to support inheritance or relationships in the object model. These amendments find support on pages 7, 8, FIG. 7, 8, 10, and 11.


Hence, Applicant respectfully submits that independent claims 1, 16, 31, 47, and 56-61 as presently amended are in condition for allowance. Applicant also submits that claims 3-15, which depend upon claim 1, claims 18-30, which depend upon claim 16, claims 33-46, which depend upon claim 31, and

claims 48-55, which depend upon claim 47, are for the same reasons in condition for allowance and for reasons of the unique combinations recited in such claims.

**CONCLUSION**

It is submitted that the present application is presently in form for allowance. Such action is respectfully requested.

Respectfully submitted,

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